

be addressed and finally decided. Very recent revelations about defendants' conduct in the underlying factual narrative have allowed plaintiff to further streamline and simplify this case, i.e., by removing at this juncture an involuntary plaintiff as a party. It is becoming increasingly clear that defendants' wrongful acts were not acts authorized by the organization they purport to represent. Yet defendants are now jumping on the removal of a nominal third party as yet another excuse to again ask for more time to respond to plaintiff's claims. Plaintiff respectfully requests that the Court not countenance these tactics of delay and DENY defendants' request for more time or further relief.¹

Respectfully submitted,

By: /s/ Scott D. Johannessen

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¹ In defendants' latest request for more time they state "Out of an abundance of caution, and due to the length and scope of the plaintiff's amended complaint, defendants will file a Motion for a brief extension to file a timely response to the amended complaint." Defendants made a similar request before from plaintiff and this Court and received over three weeks, and the reason for their request no longer exists.

CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.01, the undersigned hereby certifies that on the 25th day of November 2013 he caused a true and correct copy of the following document:

RESPONSE IN OPPOSITION TO MOTION FOR EXTENSION OF TIME

to be delivered to the following persons/entities appearing of record herein via electronic mail through the Court's ECF system:

Neil M. McIntire
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300 James Robertson Parkway
Nashville, TN 37211

By: /s/ Scott D. Johannessen
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